

# **EXHIBIT C**

# EXHIBIT E

George Marion Corson

February 6, 2008

<p>1</p> <p>2 IN THE COURT OF COMMON PLEAS</p> <p>3 FOR THE COUNTY OF PHILADELPHIA</p> <p>4</p> <p>5 GEORGE CORSON and FREIDA : JUNE TERM, 2007</p> <p>6 E. JUNG CORSON, h/w :</p> <p>7 vs. :</p> <p>8 CLARK EQUIPMENT, et al. : NO. 1384</p> <p>9</p> <p>10 Philadelphia, Pennsylvania</p> <p>11 February 6, 2008</p> <p>12</p> <p>13 Deposition of GEORGE MARION</p> <p>14 CORSON, held at the offices of PARAGON COURT</p> <p>15 REPORTING, LLC, on the above date at 10:10 a.m.,</p> <p>16 before Frank Frontino, a Registered Professional</p> <p>17 Reporter and Certified Shorthand Reporter.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Paragon Court Reporting, LLC</p> <p>23 34 North Front Street</p> <p>24 Philadelphia, Pennsylvania 19106</p> <p>25 (215) 922-2150 (800) 651-7049 (609) 268-4880</p> <p>www.paragoncourtreporting.com</p> <p>Paragon Court Reporting, LLC</p>	<p>1</p> <p>2 APPEARANCES (Continued):</p> <p>3</p> <p>4 FOX ROTHSCHILD, LLP</p> <p>5 BY: ERIC E. REED, ESQUIRE</p> <p>6 2000 Market Street - 10th Floor</p> <p>7 Philadelphia, Pennsylvania 19103</p> <p>8 Attorneys for GATX</p> <p>9</p> <p>10 GERMAN, GALLAGHER &amp; MURTAGH</p> <p>11 BY: CHRISTOPHER HILLSLEY, ESQUIRE</p> <p>12 The Bellevue - 5th Floor</p> <p>13 Philadelphia, Pennsylvania 19102</p> <p>14 Attorneys for Crouse-Hinds</p> <p>15</p> <p>16 GOLDBERG, MILLER &amp; RUBIN, P.C.</p> <p>17 BY: JESSICA REENOCK, ESQUIRE</p> <p>18 The North American Building</p> <p>19 121 South Broad Street - Suite 1500</p> <p>20 Philadelphia, Pennsylvania 19107</p> <p>21 Attorneys for Eaton Corp.</p> <p>22</p> <p>23 GOLDFEIN &amp; JOSEPH, P.C.</p> <p>24 BY: BERNARD LEVINTHAL, ESQUIRE</p> <p>25 1600 Market Street - 33rd Floor</p> <p>Philadelphia, Pennsylvania 19103-7288</p> <p>Attorneys for Rockwell</p> <p>GOLLATZ, GRIFFIN &amp; EWING, PC</p> <p>BY: MEHVUSH S. CABRALES, ESQUIRE</p> <p>Four Penn Center - Suite 200</p> <p>1600 JFK Boulevard</p> <p>Philadelphia, Pennsylvania 19103</p> <p>Attorneys for Pullman Co.</p> <p>HOLLSTEIN, KEATING, CATTELL,</p> <p>JOHNSON &amp; GOLDSTEIN</p> <p>BY: E. MICHAEL KEATING, III, ESQUIRE</p> <p>Eight Penn Center - Suite 2000</p> <p>1628 JFK Boulevard</p> <p>Philadelphia, Pennsylvania 19103</p> <p>Attorneys for General Electric</p> <p>Paragon Court Reporting, LLC</p>
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Paragon Court Reporting, LLC

George Marion Corson

February 6, 2008

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1 G. M. Corson  
 2 Tell us about the exhaust  
 3 gaskets.  
 4 A. You'd take the bolts out of the  
 5 exhaust stack and lift it up in the air and slide  
 6 the gasket out and put the new one in, put the  
 7 bolts in and tighten it down.  
 8 Q. Did it have to be scraped?  
 9 MS. DYSON: Objection.  
 10 THE WITNESS: Occasionally.  
 11 BY MR. PAUL:  
 12 Q. What did you have to scrape it out  
 13 with?  
 14 A. A putty knife.  
 15 Q. Sir, you mentioned, I believe,  
 16 compressors this morning.  
 17 A. Yes, I did.  
 18 Q. Okay. Do you recall the names of the  
 19 compressors that were used at the railroad?  
 20 MR. POWELL: Objection.  
 21 THE WITNESS: There was  
 22 Ingersoll-Rands and -- and a few others.  
 23 BY MR. PAUL:  
 24 Q. Do you recall the names of any of  
 25 the other --  
 Paragon Court Reporting, LLC

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1 G. M. Corson  
 2 I'm sorry. I didn't mean to  
 3 cut you off, sir.  
 4 Were there any compressors on  
 5 the railroad equipment itself?  
 6 A. Yes.  
 7 Q. And who manufactured those, if you  
 8 recall?  
 9 A. To my best knowledge, I think it was  
 10 Gardner (phonetic).  
 11 Q. "Gardner."  
 12 Do you recall the name  
 13 Westinghouse Air Brake?  
 14 MR. CAGNOLI: Objection.  
 15 BY MR. PAUL:  
 16 Q. You can answer the question.  
 17 A. Yes.  
 18 Q. What do you recall about Westinghouse  
 19 Air Brake, sir?  
 20 A. Westinghouse, I believe, supplied  
 21 most of the air brake parts.  
 22 Q. What kinds of air brake parts did  
 23 Westinghouse supply -- Westinghouse Air Brake  
 24 supply?  
 25 I mean, understand, you and  
 Paragon Court Reporting, LLC

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1 G. M. Corson  
 2 I -- I've not been a railroader. The lawyers  
 3 here are not railroaders.  
 4 If this is read to a jury, a  
 5 jury's not going to know what a railroad part on  
 6 a compressor is. You have to tell us.  
 7 A. Brake cylinders, I believe.  
 8 Q. Okay.  
 9 A. I think they manufactured safety  
 10 valves and --  
 11 That's about all I can think  
 12 of right now.  
 13 Q. Was there anything else in the  
 14 Westinghouse Air Brake compressor?  
 15 MR. CAGNOLI: Object to the  
 16 form, "compressor."  
 17 MR. PAUL: He said  
 18 compressor.  
 19 MR. CAGNOLI: I don't think  
 20 he did.  
 21 THE WITNESS: Not that I'm  
 22 aware of.  
 23 BY MR. PAUL:  
 24 Q. Was there a gasket in the compressor?  
 25 MR. CAGNOLI: Objection to  
 Paragon Court Reporting, LLC

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1 G. M. Corson  
 2 the form.  
 3 THE WITNESS: Oh, yes.  
 4 BY MR. PAUL:  
 5 Q. Where was the gasket in the  
 6 Westinghouse Air Brake compressor?  
 7 MR. CAGNOLI: Objection.  
 8 THE WITNESS: Under the head.  
 9 BY MR. PAUL:  
 10 Q. What's a head?  
 11 I'm sorry.  
 12 MR. POWELL: Objection.  
 13 BY MR. PAUL:  
 14 Q. I'm asking you to explain things that  
 15 are so obvious to you.  
 16 A. It's a head that holds the valve that  
 17 lets the compressor build the air.  
 18 Q. Did your dad ever remove one of these  
 19 gaskets from a Westinghouse Air Brake compressor?  
 20 A. Yes.  
 21 MR. CAGNOLI: Objection.  
 22 MR. POWELL: Objection.  
 23 BY MR. PAUL:  
 24 Q. Can you tell me how many times you  
 25 know of that he did that, if you can?  
 Paragon Court Reporting, LLC

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1 a piece of emery paper and send it.  
 2 Q. As you look back on it, do you believe  
 3 that the removal of old gasket material from  
 4 let's say a flange, a pipe flange, created any  
 5 visible dust?  
 6 A. Absolutely.  
 7 Q. And would this -- would you and your  
 8 father do gasket work on a regular basis would  
 9 you say?  
 10 A. The gasket work was more an exception.  
 11 Again, the air compressors and the power  
 12 assemblies, that was more, you know, more of  
 13 an exception. My father was the type that he  
 14 took a lot of pride in what he did. He didn't  
 15 want to send a locomotive out of that shop  
 16 that wasn't running because that meant that a  
 17 couple cars weren't going because of the  
 18 trailer and tonnage and everything. So, we  
 19 did everything within our power to make sure  
 20 that locomotives ran.  
 21 Q. I don't know if I heard you correctly,  
 22 but did you and your father also install  
 23 and/or remove car brakes or did you do mostly  
 24 locomotive brakes?  
 25 A. The majority of what we did there was

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1 locomotive work. The car brakes were by  
 2 exception, other than again the cabooses and  
 3 the tank cars that brought fuel in.  
 4 Q. You mentioned Gardner Denver as a  
 5 manufacturer of air compressors. Were these  
 6 air compressors located on or in the  
 7 locomotive I take it?  
 8 A. They were in on the Number 2 end of the  
 9 locomotive which is along the end.  
 10 Q. And is there a simple explanation as to  
 11 what these air compressors did, these Gardner  
 12 Denver air compressors?  
 13 A. That's the air that provides the  
 14 braking for the train.  
 15 Q. Okay.  
 16 And do you associate any gasket  
 17 components with the maintenance repair and/or  
 18 installation of the Gardner Denver air  
 19 compressors? Were there any gaskets used when  
 20 you would service the air compressors?  
 21 A. The gaskets that we used when we -- we  
 22 never applied an old gasket.  
 23 Q. Right.  
 24 A. So, if we pulled a head off or a final  
 25 discharge valve off we always put a new gasket

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1 on. So, anything that we removed, anything  
 2 that we interrupted a new piece went on.  
 3 Q. And for a specific manufacturer's  
 4 component, like this Gardner Denver air  
 5 compressor, would you and your father  
 6 fabricate the gaskets or would you use a  
 7 Gardner Denver replacement gasket?  
 8 A. All fabrication.  
 9 Q. Okay.  
 10 And I think when Mr. Ryan was  
 11 asking you some questions he asked you some  
 12 questions about -- was it brake valves,  
 13 Westinghouse brake valves?  
 14 A. Westinghouse brake valves on freight  
 15 cars.  
 16 Q. As you sit here today, do you associate  
 17 any asbestos-containing components with the  
 18 Westinghouse brake valves?  
 19 A. On the gaskets to the brake valves they  
 20 were rubber gaskets. I can only assume that  
 21 they didn't have any asbestos.  
 22 Q. Okay, fair enough.  
 23 Regarding the EMD -- and I  
 24 assume these are diesel locomotives?  
 25 A. Diesel electric locomotives.

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1 Q. Okay.  
 2 And looking back on it  
 3 certainly we're talking -- or it was your  
 4 understanding that these EMD locomotives  
 5 obviously contained gasket material or  
 6 gaskets; is that fair?  
 7 A. Yes.  
 8 Q. And likewise, they would have  
 9 contained, depending on the particular model  
 10 of locomotive, up to 24 brake shoes, these  
 11 locomotives?  
 12 A. Yes.  
 13 Q. What were the various combinations of  
 14 total number of brake shoes per a particular  
 15 locomotive that you can recall?  
 16 A. The older style, the switch engine had  
 17 class brakes. The GP38s that came in they had  
 18 just a single brake shoe that worked off a  
 19 slack adjuster that worked between wheels.  
 20 They were not a class brake. So, there were  
 21 some differences in the brake arrangement.  
 22 Q. And again, depending on the size and  
 23 configuration of the particular EMD  
 24 locomotive, to do a total brake change-out you  
 25 might be talking about eight, 12, 16, 20 or 24

19 (Pages 70 to 73)



TERRY CORSON

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1 locomotives and the caboose?  
 2 A. I believe the boxcar shoes and the  
 3 locomotive shoes, the composition shoes were  
 4 Cobra.  
 5 Q. Okay.  
 6 Do you remember the name of any  
 7 other company that made any of the other  
 8 brakes shoes that were used on any of the  
 9 trains that you and your father worked on?  
 10 DEFENSE COUNSEL: Objection;  
 11 asked and answered.  
 12 BY MR. RYAN:  
 13 Q. Other than these?  
 14 A. No.  
 15 Q. You mentioned a grinding shoe?  
 16 A. Yes.  
 17 Q. Do you know who made the grinding shoe?  
 18 A. No.  
 19 Q. Okay.  
 20 And you're not sure who made  
 21 the cast iron as I understand it?  
 22 A. No.  
 23 Q. We talked briefly about the insulation  
 24 on the pipes. I mean, do you remember  
 25 anything about who made any of that?

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1 A. No.  
 2 Q. The wrapping or anything like that?  
 3 A. I don't ever remember seeing any name.  
 4 Q. Okay.  
 5 Did you personally do anything  
 6 to try to find out who made it?  
 7 A. No.  
 8 Q. Do you have any knowledge as to whether  
 9 or not there had been any claims filed on  
 10 behalf of your father against any companies  
 11 that made asbestos products that are currently  
 12 in bankruptcy?  
 13 A. I don't have any knowledge of that, no.  
 14 Q. I mean, who is involved in that? Which  
 15 member of your family is involved in sort of  
 16 the processing of claims on behalf of your  
 17 father's estate?  
 18 A. My sister.  
 19 Q. Your sister, okay.  
 20 So, in other words, if a  
 21 bankruptcy claim was filed, your sister would  
 22 more likely know about it than you do?  
 23 A. Correct.  
 24 Q. Okay.  
 25 You also mentioned gaskets?

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1 A. Yes.  
 2 Q. What were gaskets used for during the  
 3 time you worked with your father?  
 4 A. When we changed power assemblies in the  
 5 locomotives there were gaskets on the power  
 6 assemblies. And when we changed or inspected  
 7 the final discharge valve on the air  
 8 compressor or we did anything to an air  
 9 compressor head there were gaskets.  
 10 Q. Okay.  
 11 Do you know who made the power  
 12 assemblies?  
 13 A. They were -- they were for EMD  
 14 locomotives. I can only say that they were  
 15 EMD. I don't know if they were aftermarket.  
 16 Q. You mentioned air compressors. Do you  
 17 know who made any of the air compressors?  
 18 A. Gardner Denver.  
 19 Q. Anyone else?  
 20 A. Not to my knowledge.  
 21 Q. And you mentioned valves. Do you know  
 22 who made any of the valves?  
 23 A. The brake valves when I said valves?  
 24 Q. Yes.  
 25 A. The brake car valves were mostly

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1 Westinghouse on the freight equipment.  
 2 Q. Can you give me some idea of the number  
 3 of times that you would have to do a removal  
 4 or replacement of a gasket? I mean, was that  
 5 an additional thing? Was that a routine  
 6 thing? I mean, can you give me some idea?  
 7 A. My best guess is that in my 10 years  
 8 working with my dad we probably changed 50  
 9 power assemblies, probably 10 a year,  
 10 somewhere in that category.  
 11 Q. Okay.  
 12 A. And as far as the air compressors, the  
 13 work on the air compressors, that was more of  
 14 a failure mode and that was more of a  
 15 wintertime problem where usually what would  
 16 happen the locomotive would shut down in  
 17 route. By the time it got to us it would  
 18 start to freeze and the air compressor seemed  
 19 to be the part that took the most damage. So,  
 20 that would be the inspection of the heads and  
 21 everything just to make sure we didn't have  
 22 anything cracked.  
 23 Q. Okay.  
 24 A. We did a couple of those a year.  
 25 Q. So, over the three or four years that

12 (Pages 42 to 45)

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# EXHIBIT G

STATE OF INDIANA )  
 )  
COUNTY OF LAKE )

IN THE LAKE SUPERIOR COURT  
  
ROOM NUMBER ONE

IN RE: Lake County Asbestos Litigation

ORIGINAL

WILLIAM M. PARKS and )  
WILMA PARKS, h/w )  
 )  
vs. )  
 )  
A.P. GREEN SERVICES, INC., et al )

NO. 45D01-9902-CT-154

**DEFENDANT AMERICAN STANDARD INC.'S  
RESPONSES TO MASTER INTERROGATORIES  
AND REQUESTS FOR PRODUCTION TO ALL DEFENDANTS**

Pursuant to the Indiana Rules of Civil Procedure, Defendant American Standard Inc. ("AST" or "this Defendant") provides the following Responses to Master Interrogatories and Requests for Production to All Defendants.

**PRELIMINARY STATEMENT AND  
GENERAL OBJECTIONS**

This Defendant's Response to each of these Interrogatories and Requests for Production incorporates this Preliminary Statement and these General Objections.

The information used in responding to these Interrogatories and Requests for Production was assembled by authorized employees and counsel for this Defendant and was derived primarily from ongoing discussions with this Defendant's past and present employees. Because much of the information is of, or relates to, events of many years ago, it is difficult, if not



chrysotile asbestos was added to the wear stock of COBRA® composition shoes. The COBRA® composition brake shoes that contained asbestos contained chrysotile fibers totally encapsulated in a resin and synthetic bond.

From 1927 through 1964, WABCO manufactured and sold steam driven air compressors for railroad steam locomotives. Within these compressors were certain high temperature gaskets that contained chrysotile asbestos. WABCO did not manufacture the gaskets but bought them in completed form. Such gaskets contained 1/32" asbestos completely encased between layers of copper sheeting. Those gaskets were called "Cobestos" and made by Metallo Gasket Company.

From 1944 through 1985, WABCO sold diesel driven air compressors for use in diesel electric railroad locomotives. Those compressors contained certain high temperature gaskets that contained small amounts of encapsulated, chrysotile asbestos fiber. The high temperature gaskets were not manufactured by WABCO, but were purchased in completed form without change. Such gaskets were manufactured by Armstrong or Garlock.

From late 1969 or early 1970 until 1976, WABCO occasionally supplied Budd style disc brakes which contained brake linings with an unknown, but encapsulated, chrysotile fiber content. Such brakes were applied strictly to some mass transit commuter vehicles and to AMTRAK intercity vehicles. The brake linings were not manufactured by WABCO, but were purchased in completed form without material alteration. From 1970-74, the linings were manufactured by Raybestos-Manhattan. From 1974-76, the linings were manufactured by Johns-Manville Corporation. The trade name of Budd disc brake was initially used for the disc brakes

EXHIBIT H

0001

1 IN THE CIRCUIT COURT FOR THE  
2 COUNTY OF SPOTSYLVANIA, VIRGINIA

3 JANET GALLANT PITTS, : CIVIL ACTION

4 Executrix of the Estate of :

5 WILLIAM E. PITTS :

6 vs. :

7 BORG-WARNER CORPORATION, :

8 et al. : 177CL01-282

9 Philadelphia, Pennsylvania

10 July 11, 2006

11 Pretrial examination of

12 HORACE M. DELISSER, M.D., taken on behalf

13 of the Plaintiff at the Sheraton

14 University City Hotel, 36th and Chestnut

15 Streets, Philadelphia, Pennsylvania, on

16 the above date, commencing at 5:05 p.m.,

17 before Linda A. Ricciardi, Certified Court

18 Reporter.

19

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21

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33 Counsel for Defendant

34 Honeywell International, Inc.

35

020

1 Q. Dr. Delisser, my name as you heard  
2 is John Cosmich, I represent  
3 Owens-Illinois. Do you know anything  
4 about Owens-Illinois at all?

5 A. Not much. I know there is a  
6 connection with the companies in the past  
7 that may have made insulation products  
8 that I think you are connected with now,  
9 but I couldn't give you the lineage.

10 Q. Fair enough. Now, I apologize, I  
11 have not been provided with any of your  
12 previous depositions, okay, and I don't  
13 want to keep us here all night by any  
14 stretch, but I do want to get into a  
15 little bit of background first, if that is  
16 okay. And just to start that, where did  
17 you go to medical school?

18 A. University of Pennsylvania.

19 Q. If you would just briefly outline,  
20 rather than me asking all the questions,  
21 you know where I am going so why don't you  
22 tell me about your educational background  
23 and your training, et cetera?

24 A. Sure. I went to Temple under

022

1 teach?

2 A. Yes.

3 Q. Would you agree with me that  
4 exposure to chrysotile asbestos can cause  
5 asbestosis?

6 A. What I would say is we have to be  
7 specific about the conditions of the  
8 exposure, the amount of exposure, the  
9 duration of exposure, and given all of  
10 those things there is a potential for  
11 chrysotile to cause or contribute to the  
12 development of lung disease, but, again,  
13 as I said, you have to speak in terms of  
14 dose, duration, intensity, occupation.

15 Q. We will get into each of those  
16 shortly, but would you agree with me that  
17 exposure to chrysotile asbestos can cause  
18 mesothelioma?

19 A. Again, I don't want to sound like a  
20 broken record, but I think the statement  
21 has to be qualified by the other things I  
22 mentioned, dose, duration, intensity and  
23 nature of occupation.

24 Q. So at certain doses, at certain



023

1 durations and with respect to certain  
2 occupations you agree that chrysotile can  
3 cause mesothelioma?

4 A. It could.

5 Q. And I have to ask those, I don't  
6 know where you stand on this, okay. At  
7 what dose level does chrysotile asbestos  
8 cause mesothelioma?

9 A. The precise, the exact threshold is  
10 still a subject of debate and contention.  
11 So I can't give you a precise number, but  
12 certainly you are looking at exposures  
13 that are anywhere from 10 to 15 to 20  
14 fibrous CCs of exposure and above, at a  
15 minimum, at a minimum.

16 Q. What literature or articles do you  
17 base that opinion on, that being it would  
18 be a minimum of 10 to 15 to 25 fibrous per  
19 CC of chrysotile to cause mesothelioma?

20 A. I think there are a number of texts  
21 that have reviewed this, I would cite  
22 Churdsworth in his text, I would also cite  
23 some of Rodley's work.

24 Q. Are you aware of any literature that

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1 amphiboles as well, and to just find  
2 chrysotile alone is highly unlikely, again  
3 at significant levels.

4 Q. Would you agree with me that it is  
5 generally felt that mesothelioma arises  
6 from a single cell?

7 MR. DICKEY: Object to the form  
8 of the question.

9 THE WITNESS: I guess I am  
10 pausing a little bit because, you  
11 know, cancer may begin with a single  
12 cell, but usually it requires  
13 multiple processes that are in play.

14 BY MR. COSMICH:

15 Q. Would you agree with me that it is  
16 generally felt that there must be multiple  
17 changes to a particular cell before it  
18 will become bad and become a cancer?

19 A. Right, there are multiple steps in  
20 the process of becoming a malignant cell.

21 Q. And that is true for mesothelioma as  
22 well?

23 A. Yes.

24 Q. As best we know?

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1 A. Yes.

2 Q. And, of course, we don't know from  
3 which fiber, from which year that actually  
4 caused a particular cell to go bad,  
5 correct?

6 A. Are you talking about a single fiber  
7 with a single cell?

8 Q. Yeah.

9 A. There is no way of knowing.

10 Q. We don't know which of those changes  
11 that occur to make a cancer or a  
12 mesothelioma arise or begin that are  
13 caused by asbestos, do we?

14 A. Say that again.

15 Q. We don't know which of the changes  
16 that occur to a cell to make it a cancer  
17 or that are actually caused by asbestos,  
18 do we?

19 A. Are you asking are there co factors?

20 Q. Right.

21 A. There may be co factors besides  
22 asbestos fibers.

23 Q. But we also don't know which of the  
24 specific changes are caused by asbestos?

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1 A. You are talking about molecular  
2 changes?

3 Q. Right.

4 A. I still think the state of knowledge  
5 is such that we are still trying to  
6 understand exactly how asbestos fibers  
7 induces cancer.

8 Q. We don't know whether or not those  
9 changes at the cellular or molecular level  
10 are any different with respect to an  
11 amphibole fiber or a chrysotile fiber, do  
12 we?

13 MR. DICKEY: Object to the form  
14 of the question.

15 THE WITNESS: I think what is  
16 clear is that chrysotile is less  
17 carcinogenic, significantly less  
18 carcinogenic, it may even not be, I  
19 think the data suggests certainly  
20 less carcinogenic and may not be,  
21 and so the mechanisms that  
22 chrysotile may induce cancer may  
23 well be different from say an  
24 amphibole.

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1 I mentioned also the issue of  
2 persistence, I think that has to be  
3 kept in mind that the lung is much  
4 more likely to be exposed for a  
5 longer duration to an amphibole  
6 fiber than a chrysotile fiber.

7 So persistence, and I think  
8 also the fibers are different and  
9 certainly likely to induce different  
10 mechanisms, and, again, we have data  
11 that fully indicates that a person  
12 exposed to chrysotile is much less  
13 likely to come down with a  
14 malignancy.

15 BY MR. COSMICH:

16 Q. You are not espousing the opinion  
17 today that chrysotile is not carcinogenic?

18 A. Right, I am not saying that. What I  
19 am saying is the risk is less, and it is  
20 significantly less than compared to  
21 amphiboles.

22 Q. You don't doubt that Mr. Pitts in  
23 the course of his employment was exposed  
24 to chrysotile from other products, are

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1 you, in the insulation product, et cetera  
2 that he was exposed to?

3 A. Say it again.

4 Q. You don't doubt that Mr. Pitts was  
5 exposed to chrysotile from other products,  
6 not friction products but other products  
7 in the course of his work?

8 A. I can't recall all the specifics  
9 that he could have been exposed to, but  
10 certainly there was asbestos in a lot of  
11 different products so there is the  
12 potential for him to be exposed to  
13 different things other than just the  
14 friction products.

15 Q. To adequately determine his total  
16 dose of chrysotile and thus his potential  
17 risk from chrysotile exposure you need to  
18 consider all the sources of his chrysotile  
19 exposure, wouldn't you?

20 MR. BICKEY: Object to the form  
21 of the question.

22 THE WITNESS: I guess what I  
23 would say is it would be important  
24 to understand what all his exposures



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1           were.

2       BY MR. COSMICH:

3       Q.     All of his chrysotile exposures  
4       would be important to assessing his total  
5       effect?

6           MR. DICKEY: Object to the form  
7       of the question.

8           THE WITNESS: I guess what I  
9       would say is that is important  
10      information to have, but, again, it  
11      would come back to a specific  
12      exposure, and if we are focusing on  
13      the exposure associated with being a  
14      mechanic, the exposure associated  
15      with friction products like brakes  
16      we have literature that says that  
17      specific exposure, that specific  
18      exposure is not associated with  
19      development of mesothelioma, lung  
20      cancer or asbestosis.

21      BY MR. COSMICH:

22      Q.     Well, does it say it is not if it is  
23      combined with other chrysotile exposure,  
24      does it?